

STATE OF COLORADO

Roy Romer, Governor
Patti Shwayder, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

<http://www.cdphe.state.co.us/hm/>

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Denver, Colorado 80246-1530
Phone (303) 692-3300
Fax (303) 759-5355

222 S. 6th Street, Room 232
Grand Junction, Colorado 81501-2768
Phone (303) 248-7164
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Colorado Department
of Public Health
and Environment

November 4, 1997

Karan North
Kaiser-Hill Company, L.L.C
Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, CO 80402-0464

**RE: Close-Out of the October 15, 1997 Inspection of Building 865
EPA Identification Number C07890011526**

Dear Ms. North:

On October 15, 1997, inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), conducted a routine compliance evaluation inspection of Building 865. The Division has received and reviewed your response to that inspection, dated October 28, 1997. Based upon our review of your response, all issues identified during the referenced inspection have been resolved to the satisfaction of the Division. Therefore, the Division does not intend to take any further action in response to that inspection, at this time.

As follow-up to the October 15, 1997 inspection and a previous inspection at Building 440, Division inspectors observed four cargo containers located immediately to the south of Building 865 and container stacking configurations at Building 440 on October 30, 1997. No issues were identified as a result of evaluating those areas.

The Division appreciates your timely and complete response to the issues identified during the October 15, 1997 inspection. Please contact Ed Smith of my staff at (303) 692-3386 if you have any questions regarding this memorandum or the close-out of the inspection.

Sincerely,

Joe Schieffelin, Unit Leader
Federal Facilities Permitting and Compliance
Hazardous Materials & Waste Management Division

cc: w/attach

cc: w/o attach

Karan North, K-H
Bob April, DOE-RFFO
Gary Konwinski, RMRS
Mike Simmons, MSC

Dan Miller, AGO
Janice Pierson, EPA
Tim Reyder, EPA
John Wrapp, K-H
Jefferson County Health Department

Best Available Copy

ADMIN RECCRD
IA-A-000449

1/23/24

EPA I.D. #CO7890010526

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION: October 15, 1997

FACILITY: Rocky Flats Environmental Technology Site - US DOE,
Building 865

LOCATION: 16 miles NW of Denver
Golden, CO 80402

FACILITY REP: Gary Konwinski, RMRS
Mike Simmons, MSC

TELEPHONE: 303-966-2729

TELEFAX:

NOTIFICATION STATUS: Large Quantity Generator
Land Disposal Facility

TYPE OF INSPECTION: Compliance Evaluation Partial

PARTICIPANTS: Cindy Burbach, CDPHE
James Hindman, CDPHE
Edward Smith, CDPHE
Gary Konwinski, RMRS
Mike Simmons, MSC

WEATHER CONDITIONS: Warm and sunny

TIME IN: 8:00 am, October 15, 1997

TIME OUT: 11:00 am, October 15, 1997

US DOE - Rocky Flats Environmental Technology Site Building 865

--- INTRODUCTION ---

On the morning of September 25, 1997, inspectors Cindy Burbach, James Hindman, and Edward Smith from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) arrived at the Rocky Flats Environmental Technology Site (RFETS) to conduct a partial compliance evaluation inspection of Building 865. Attachment one provides a list of the people that were present at the opening conference.

Mike Simmons of Material Science Corporation (MSC) was the facility point of contact and escorted Division inspectors through Building 865. Mr. Simmons indicated that, historically, Building 865 was constructed in 1970 and was used as a metallurgical research and development building in support of the previous weapons production mission at RFETS. Currently, many of the large metal presses and machining equipment are being removed for transport to other DOE sites for reuse; however, many of the large pieces of equipment remain in the building. Additionally, Building 865 is the location of the former Beryllium Cell. The Beryllium Cell is being dismantled and cleaned out as part of a supplemental environmental project agreed to through Compliance Order on Consent Number 97-08-21-01.

--- OPERATIONS INSPECTED ---

Accompanied by facility representatives, Division inspectors observed all areas of Building 865, including the second floor mezzanine and areas external to the building. The Beryllium Cell (i.e., Room 151) was observed through a window, but Division inspectors did not enter that room due to personnel protective equipment requirements. The following is a summary of the areas that were evaluated during the inspection.

Accumulation Areas.

At the time of the inspection, there were no permitted treatment or storage units located within Building 865. However, RMRS is responsible for operation of a 90-day accumulation area, Unit 865-2308, within that building. At the time of the inspection, there was only one container in the 90-day accumulation area. No issues were identified as a result of evaluating the 90-day accumulation area. In addition to the 90-day accumulation area, there were three satellite accumulation areas present within Building 865, at the time of the inspection. The unit numbers for those accumulation areas are 865-2298, 865-2303, and 865-2364. Division

inspectors reviewed the inspection log sheets for the four accumulation areas at the time of the inspection walk through. No issues were identified as a result of evaluating the accumulation areas or the associated inspection log sheets.

Waste Chemicals, Room 148. Division inspectors evaluated Room 148 where facility representatives indicated that waste chemicals were being consolidated for future packaging by Radian Corporation. Division inspectors observed a small container identified by the manufacturer's label as "Led-Plate No. 250". The container in question was open with a brush in the Led-Plate. Because the Led-Plate appeared to be more "waste-like" than "product-like", Division inspectors indicated that the Led-Plate should be taken to the 90-day accumulation area or managed in a satellite accumulation area. Facility representatives indicated that the Led-Plate would be managed as a hazardous waste.

Also in Room 148, Division inspectors observed two poly-drums containing a material referred to as "Ox-Out". Division inspectors observed one 55-gallon poly-drum of Ox-Out that was approximately one third full and one 30-gallon poly-drum of the same material that was approximately half full. The containers were marked as "U contaminated Ox-Out". Division inspectors also observed that neither container was marked or labeled as hazardous waste nor were accumulation start dates assigned to the containers. Facility representatives indicated that the Ox-Out is a nitric acid based cleaning agent that is no longer used in the building. Facility representatives further stated that the Ox-Out is corrosive due to the nitric acid, and it would be managed as a hazardous waste at the 90-day accumulation area for the building (i.e., Unit 865-2308). Division inspectors agreed that the Ox-Out should not be considered a waste chemical and should be moved to the 90-day accumulation area. This matter was discussed further at the inspection close-out meeting.

Finally, in Room 148, Division inspectors observed seven small containers of approximately two gallons each. Facility representatives indicated that the cans contained oil for production equipment that had been removed from the building. Because there was no further need for those oils they were being included in the waste chemical roundup. The oils had not been used, according to facility representatives.

Used Oil.

During inspection of the machine area of Building 865, Division inspectors observed a large number of drums that contained contaminated used oil. The drums were posted with radiological markings but were not marked with the words "used oil" as required by 6 Colorado Code of Regulations (CCR) 1007-3, section 279.22(c). In particular, Division inspectors observed five containers identified with item description code (IDC) number 505 (i.e., miscellaneous neutral waste solution pH greater than 2.0 and less than 12.5). The associated traveler for these drums indicated that the drums contained a mixture of water and oil. The container numbers for the drums in question were RO1417, RO1349, RO1397, RO1432, and RO1500. In that same area, Division inspectors observed another drum (RO1144) with a similar radiological label and identified as IDC 529 (i.e., miscellaneous

organic/liquid solution) on the waste traveler. The waste traveler for that container also indicated that the contents were used oil but the container was not marked or labeled as such. Finally, Division inspectors observed two containers that were labeled as containing radioactive material and identified as IDC 533 (i.e., miscellaneous organic solids) on the associated waste travelers. The waste traveler indicated that the contents of the containers (RO1147 and RO1436) were oil/coolant from Hydrosprin. As with the other drums identified, these two containers were not marked with the words "used oil".

Drum Liner.

Division inspectors observed a clear plastic bag which contained a drum liner that was still labeled as hazardous waste. Division inspectors asked facility representatives whether the liner had held acutely hazardous waste and, if so, whether the liner had been triple rinsed in order to meet the definition of "empty". Facility representatives indicated that the liner did not contain acutely hazardous waste and that the waste label was no longer applicable. Division inspectors indicated that since the container liner was empty, the hazardous waste label could be removed and such action would eliminate any future questions.

Unknown Drums.

Division inspectors raised questions related to three drums that were identified on the east side of the bay area. One of the drums was a light green color and there were no obvious indications of any bar coding. The other two drums were grey in color. One of the drums was marked as "Be, oxide, steel, Al shavings" and the other drum was marked as "2/3 full Be oxide". Facility representatives indicated that they did not know what the containers were storing or the origin of the drums. Division inspectors discussed that matter further at the close-out meeting.

Treatability Study Permacon Unit.

Division inspectors observed a fairly large Permacon structure that had been used for conducting treatability studies on beryllium contaminated wastes. Division inspectors observed a number of drums and small containers through the clear plastic walls of the Permacon. There did not appear to be any hazardous waste labels on the containers within that structure, and facility personnel indicated that the contents of all containers within the Permacon are non-hazardous. Division inspectors requested an inventory and a hazardous waste determination for all items within the Permacon as part of the close-out meeting.

Areas External to Building 865. In conclusion of the inspection, Division inspectors evaluated the areas external to Building 865. Division inspectors observed a number of cargo containers to the south of Building 865 that were marked as "carpenter shop". Facility representatives indicated that Dyncorp is the owner of those cargo containers and they would have to be contacted for access. Division inspectors requested an inventory of the cargo containers as part of the close-out meeting.

Division inspectors completed the physical inspection of these three RCRA units at approximately 10:30 am on September 25, 1997.

--- DOCUMENTS REVIEWED ---

Division inspectors reviewed the following documents as part of the Building 865 inspection:

1. Inspection logs for the 90-day accumulation area and the three satellite accumulation areas. No issues were identified as a result of that review.
2. Training records for personnel involved with hazardous waste management activities at Building 865. No issues were identified as a result of that review.
3. Waste and Environmental Management System (WEMS) Reports for various containers identified during the inspection. No issues were identified as a result of that review.

--- INSPECTION CLOSE-OUT ---

As a result of the inspection, five issues were identified and shared with facility representatives during the inspection close-out meeting, which began at approximately 11:00 am on September 25, 1997. The following issues were discussed at the close-out meeting:

1. The Led-Plate No. 250 in Room 148 should be managed as a hazardous waste rather than as a "waste chemical". Any used oils in that room should be managed as used oil rather than as a "waste chemical".
2. Mark containers of used oil in accordance with 6 CCR 1007-3, section 279.22(c) if they will be recycled, or provide justification as to why they cannot be recycled, the disposition of the oil, and a hazardous waste determination. Note: a subsequent review of the *Federal Register* language on this matter indicated that all used oils are subject to the 279 standards until they are disposed on-site or sent off-site for disposal. Therefore, the oils should be marked as used oil, irrespective of whether they will be recycled. Representatives of Kaiser-Hill were provided with a copy of the *Federal Register* language on this matter on October 22, 1997.
3. The two drums of Ox-Out should be labeled as a hazardous waste, dated with an appropriate accumulation start date and managed at the 90-day accumulation area.
4. Provide an inventory and hazardous waste determination with supporting justification for items in the Permacon.

5. A hazardous waste determination is required for the two grey drums that appeared to contain beryllium oxide and the green drum for which the contents were unknown.
6. Provide an inventory for cargo containers on the south side of Building 865. Representatives from Kaiser-Hill were informed that a visual inspection by Division inspectors would be adequate in place of an inventory.

Gary Konwinski (RMRS) and Mike Simmons (MSC) signed the Notice of Inspection (NOI) as the facility representatives. Division inspectors left a copy of the NOI with facility representatives and ended the inspection at approximately 11:00 am on September 25, 1997.

--- INSPECTION FINDINGS ---

The following two findings were identified as a result of the inspection:

1. One small can of Led-Plate No. 250 and two containers of Ox-Out, located in Room 148, were being managed as "waste chemicals". Because Section 8.0 of the Waste Chemical Project Plan does not include process generated wastes within the definition of "Chemical", a hazardous waste determination should have been made for those items per 6 CCR 1007-3, section 262.11. Additionally, those items should have been managed in a satellite accumulation area or a 90-day accumulation area with appropriate container marking or labeling per 6 CCR 1007-3, section 262.34.
2. Numerous containers, as detailed in the previous section, of used oil were not marked or labeled with the words "used oil" as required by 6 CCR 1007-3, section 279.22(c).

--- SIGNATURE BLOCK ---

Prepared by: Edward N. Smith 10/22/97
Edward Smith Date

Reviewed by: Cindy Burbach 10/27/97
Cindy Burbach Date

Reviewed by: James A. Hindman 10/28/97
James Hindman Date

Approved by: Joe Schieffelin 10/27/97
Joe Schieffelin Date

--- ATTACHMENTS ---

1. Opening Conference List of Attendees
2. Notice of Inspection
3. RMRS and MSC Response to the NOI

Attachment One

Opening Conference List of Attendees

Attachment One
Opening Conference List of Attendees

Name	Organization	Phone Number
Ed Smith	CDPHE	966-6607
Cindy Burbach	CDPHE	966-6760
Mike Simmons	MSC	966-7574
W. J. Padron	RMRS	966-3194
D. E. Kuntz	RMRS	966-5879
R. M. Leitner	K-H	966-3537
G. R. Konwinski	RMRS	966-2729
James Hindman	CDPHE	966-4482
Henrick Padron	RMRS	966-7357
R. L. Borrego	RMRS	966-4114

Attachment Two
Notice of Inspection

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222
(303) 692-3300

Notice of Inspection

Facility Name Rocky Flats Environmental Technology Site (BUILDING 865)			EPA I.D. # C07890010526		Date 10/15/97	
Street P.O. Box 928			Telephone # (303) 966-7000		Seq. #	
City Golden	County Jefferson	Zip 80402	Inspection Arranged Prior to Inspection (X) Yes () No		Hour In: 8:00 am	
Facility Representatives and Titles Bldg 865: Gary Kowalski, RMRSE, Mgr. Michael Simmons, MSC OPER. MGR			Enter By: (X) Consent () Warrant		Hour Out: 11:00 am	
			Agency: (X) State () Oversight () Joint			
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or <input type="checkbox"/> Other _____ If Status Changed, Facility Should Revise Notification						

COMMENTS:

1. The led Plate No, 250 in Room 145 should be managed as a HW rather than excess chemicals. Any used oils in that same room should not be managed as "waste chemicals".
2. Mark containers of used oil per 6CCR 1007-3, section 279.22 if they will be recycled, or provide justification for why they cannot be recycled, the disposition and HW determination.
3. The 2 drums of Ox-Out should be labeled as HW, dated with an accumulation start date and managed at the 90-day accumulation area.
4. Provide an inventory and HW determination with supporting justification for items in the permacore.
5. Provide a HW determination for 3 drums on the south of Bldg
6. Provide an inventory for cargo containers on the south side of Bldg (K-H)

Compliance Assistance: ☐ Compliance Information ☐ Referral to Compliance Assistance ☐ Pollution Prevention ☐ Field Assistance

Samples, Documents, Plans, and / or Photos Collected	4. ① Review of TSR reports are pending
1. Provide a written response to	5.
2. the above by October 30, 1997	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Gary R. Kowalski 10-15-97
Michael Simmons 10-15-97

Signature of Facility Representative

~~Lead Inspector:~~ *Cindy Burbach*
Assisting Inspector(s) and Multimedia Participant(s):
James Hindman
Lead Inspector: *Ed Smith (lead)*

Attachment Three

RMRS/MSC Response to the Inspection

CORRES. CONTROL

LTR. NO.

Originator Ltr Log #

97 - RF -

DIST.	LTR	ENC
BENSON, C.A.		
CARMEAN, G.H.		
DAWSON, D.		
EDWARDS, J.D.		
FINDLEY, M.E.		
FITZ, R.C.		
GUINN, L.A.		
HUGHES, F.P.		
MCANALLY, J.L.		
POWER, A.P.		
REED, A.B.		
TYSON, A.M.		
WAGNER, M.J.		
WHEELER, M.		



**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment

Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2729
Fax: (303) 966-8244

October 28, 1997

John Wrapp
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

RESPONSE TO CDPHE INSPECTION OF OCTOBER 15, 1997 - GRK-319-97

On October 15, 1997, the Colorado Department of Public Health and Environment (CDPHE) conducted an inspection of Building 865. Building 865 is a RMRS managed facility, with Manufacturing Sciences Corporation (MSC) being the tenant that operates within the building.

There were six issues documented on the Notice of Inspection, dated October 15, 1997. The issues, the responsible company, and responses to the RMRS issues follow:

- The Led Plate No. 250 in Room 145 should be managed as a hazardous waste rather than an excess chemical. Any used oils that are in the same room should not be managed as "waste chemicals." This is a MSC issue.
- Mark containers of used oil per 6CCR 1007-3, Section 279.22 if they will be recycled or provide justification why they can not be recycled. This is a RMRS issue. Response: The containers of oil have been marked with the words "used oil." Furthermore, RMRS has researched this issue and is in the process of informing all Unit Custodians of this issue.
- The 2 drums of Ox-Out should be labeled as a hazardous waste, dated with an accumulation start date, and managed at a 90-day area. This is a MSC issue.

RMRS RECORDS	X	X
RF CORRES. CONTROL		
TRAFFIC		
PATS/T130G		
CLASSIFICATION:		
UCN		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

SIGNATURE:

Date: 10/28/97

IN REPLY TO RF CC NO.:

ACTION ITEM STATUS:

PARTIAL/OPEN

CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:

RF-46469 (Rev. 1/97)

Post-it® Fax Note	7671	Date	11/3/97	# of pages	7
To	Ed Smith	From	John Wrapp		
Co/Dept	CDPHE HWMD	Cn.	KH		
Phone #	692-3386	Phone #	966-5883		
Fax #	759-5355	Fax #	966-3578		

John Wrapp
October 28, 1997
GRK-319-97
Page 2

- Provide an inventory and a hazardous waste determination with supporting justification for items in the permacon. This is a RMRS issue. Response: The items that are in the permacon were the subject of a CDPHE inspection that was conducted on October 16, 1996. In response to that inspection an inventory of the contents of the permacon was submitted to the CDPHE. A copy of that letter dated January 31, 1997 (reference GRK-050-97) and the associated inventory are enclosed as a portion of Attachment 1. The inventory lists all of the containers that were in the permacon. As noted on the inventory, all of the beryllium powder has been removed from the permacon. Additionally, a July 18, 1996, CDPHE Contact Record was utilized as supporting information for the hazardous waste determination. The final paragraph on page one of this Contact Record discusses the waste characterization rationale. The Contact Record is enclosed as a portion of Attachment 1. In summary all of the items in the permacon have some amount of beryllium contamination as well as a radiological component. All of the beryllium is in the form of slag; consequently, it is not hazardous.
- Provide a hazardous waste determination for the three drums on the south side of the building. This is a RMRS issue. Response: One of the drums contains a coolant that is a product and will be utilized by MSC. The other two containers are vacuum units that are fitted to 55-gallon drums. These units were utilized to remove oil, sludge, and metal turnings from equipment in Building 865. A 90-day area (number 865-2405) has been established for the storage of these units. A representative sample of the materials will be acquired and a hazardous waste determination will be made. This data will be forwarded to you.
- Provide an inventory for the cargo containers on the south side of the building. The Notice of Inspection indicated that this was a Kaiser-Hill issue. To support you in determining the contents of the cargo containers, I acquired the following identification numbers:

Cargo Number 2046380, DOE Property Number 00048141-00
Cargo Number 265084, DOE Property Number 00038303-00

RMRS is pleased to provide this information and requests that you forward it to CDPHE on or before October 30, 1997. If I can be of additional assistance in this effort please contact me at extension 2729.



Gary R. Konwinski
Environmental Manager

Attachment
As Stated

cc:
K. North, KH (w/o attachments)

ATTACHMENT 1



Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment

Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2729
Fax: (303) 966-8244

January 31, 1997

John Wrapp
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

Subject: INFORMATION FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH AND
ENVIRONMENT (CDPHE)-GRK-050-97

The CDPHE requested information associated with the method that was utilized to determine the waste characterization of painted masonry surfaces, the inventory of the Building 865 Permacon, and characterization data for the C&C lathe located in Building 444. The waste characterization method, associated with painted masonry surfaces, has been transmitted to your Mr. Shelton by way of RMRS cover letter dated January 30, 1997 (reference GRK-047-97). Consequently, that issue will not be further discussed.

The inventory for the Building 865 Permacon is attached to this letter. Additionally, the characterization of the oil residue that was observed to be in the C&C lathe catch pan, designated by sample number 97J1045, is attached. This piece of equipment has an idle equipment number of 444-0222. Additional information associated with the lathe is attached, on page 13 of the October 25, 1996 idle equipment print out. The analytical results indicate that the listed constituents of cadmium and lead were found to be present in this oil.

Please forward this information to CDPHE. Thank you for your prompt assistance in this matter. If I can be of further assistance in this matter, please contact me at extension 2729.

Gary R. Konwinski
RMRS, Environmental Manager

Attachments (3)
As stated

cc:
Asa Reed
Graeme Rankin
Bill McAndrew
RMRS Records
File

REVIEWED FOR CLASSIFICATION/UCNI

By B. M. Hoffman W/VK
Date 1-31-97

Inventory of Room 172 in Building 865

The contents of the Building 865 Permacon (Room 172) were evaluated. An inventory of the contents of the room is shown below. It should also be noted that RMRS is in the planning phases of a program to remove all of the contents from Room 172.

Four containers that were transferred for the beryllium cell to Room 172. They are described as follows:

- 1) A plastic container containing a minimal amount of beryllium processing residue slag.
- 2) Three containers with approximately 40 kilograms of beryllium chips, each. Approximately half of the volume is a beryllium/salt slag mixture. The other half is a beryllium, salt, and uranium slag mixture.

Additional containers in Room 172 are as follows:

- 1) Blue cut-off drum, containing micron-master measuring equipment. Individual DOE property numbers are: 38245-00 and 38244-00.
- 2) Small gray can, which is empty.
- 3) Silver bucket, containing 2% beryllium oxide and trash.
- 4) Trash can, containing beryllium specification 65, a small gray container, beryllium contaminated tooling, white mold wash, and foil. The beryllium 65 has been removed from the room.
- 5) 30 gallon fiber-board drum, containing approximately 10 pounds of beryllium oxide powder.
- 6) 14 gallon fiber-board drum, containing approximately 10 pounds of beryllium crumbs.
- 7) Gray drum, containing a plastic bottle with approximately 20 pounds of 325-mesh beryllium powder. The beryllium powder has been removed from the room.
- 8) 30-gallon drum, containing approximately 25 pounds of beryllium fuel powder. Order number 58-2422, lot number R8212. This drum has been removed from the room.
- 9) Several small containers of beryllium chunks and beryllium flakes.
- 10) Several carbon molds. Former area employees indicated that these are unused molds.

OCT-16-97 THU 15:10

BLDG 881

FAX NO. 303 966 2126

P. 02

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
 COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT/
 ENVIRONMENTAL PROTECTION AGENCY CONTACT RECORD

JFR-087-96

DATE: July 18, 1996

Site Contact(s):

John Ross Jr., SSOC/LATA

EXTENSION: 6150

CDPH&E/EPA Contact:

Cathy Alstatt, 692-3349

AGENCY: Hazardous Material Compliance CDPH&E Division

REPORT ON BUILDING 865/NCPP ISSUES MEETING

Purpose of Contact: On July 18, 1996, a meeting was held with Cathy Alstatt, CDPH&E, in Building 865 to discuss issues related to building deactivation in support of the National Conversion Pilot Program (NCPP). Three important agreements were reached with the state:

- 1.) Safe Sites of Colorado (SSOC) personnel and the State came to a final agreement on characterization of wastes from the beryllium chloride (BeCl) Cell and planned the strip out as non-RCRA regulated.
- 2.) CDPH&E agreed that debris treatment for Building 865 and 883 tank system closure could be written into the closure plan.
- 3.) CDPH&E requested that closure plans for RCRA tank systems in Buildings 865 and 883 be submitted to the State with a commitment to complete closure by April, 1997.

Background: This meeting was a continuation of previous discussions regarding the BeCl Cell and risk reduction in support of NCPP. Alstatt requested a work breakdown and schedule by which the Cell could be remediated. Michael Klein prepared the requested information for this meeting.

Personnel Present:

Cathy Alstatt, CDPH&E
 Lou Eng, SSOC/LATA
 Karen Lavorato, Kaiser Hill
 Michael Klein, SSOC
 Ted Karas, SSOC/LATA
 Jim Newlan, SSOC

Michael Plankington, SSOC
 Michael Riendeau, Kaiser Hill
 John Ross, SSOC/LATA
 Mike Simmons, MSC
 Randy Walker, Kaiser Hill

Discussion: 400/800 Risk Reduction personnel provided Alstatt a status on activities related to the BeCl Cell including information on the recently revised operations order. Alstatt asked several questions about the operations order. Jim Newlan provided the necessary clarifications.

Michael Klein explained the work breakdown to Alstatt noting that dates had not been designated for specific activities; however, the duration of remediation could last up to eighteen months. Alstatt seemed concerned, indicating that drivers under the NCPP are requiring liabilities to be eliminated or reduced by April, 1997; the same time the phase three of NCPP is scheduled to begin. Alstatt indicated that such an extended schedule should be reviewed with the NCPP steering committee.

Alstatt and building personnel discussed the difficulties regarding remediation of the cell and obstacles preventing compression of the eighteen month schedule, including funding and characterization.

Alstatt questioned the current characterization of materials in the Cell as non-RCRA regulated. She was particularly interested in the characterization of the Be produced by the Cell. She indicated that this material may meet the definition of a Be commercial chemical product. Jim Newlan provided two containers on Be flake generated by the BeCl Cell and explained the difference between these samples and the powders purchased commercially for other operations in the building. Alstatt acknowledged this difference and indicated that she was not sure if regulations specified a particle size for Be powder being regulated as a P015 waste. After much discussion, Alstatt agreed that the wastes generated for remediation of the flake/product section of the Cell would not be RCRA regulated.

OCT-16-97 THU 15:11

BLDG 881

FAX NO. 303 966 2126

P. 03

CDPH&E/EPA Contact Record

July 25, 1996

JFR-087-86

Page 2

Closure of the RCRA tank systems in Buildings 865 and 883 was also discussed. Alstatt indicated that the State is calling in the closure plans for these systems. She requested that John Ross determine a reasonable date by which the plans could be revised and to contact her by July 22, 1996 in order to commit to said date.

Mike Simmons, MSC, asked for clarification of closure and permitting requirements. He needed to know if the Carbon Dioxide Cleaning Cell would need to be permitted as a RCRA treatment unit. Alstatt stated that a treatment permit will not be required since CO₂ cleaning can be written into the closure plan as a Permit-By-Rule.

Actions: Determine a revision and transmittal date for the closure plans, and contact Cathy Alstatt by July 22, 1996. (John Ross)

It is also recommended that Kaiser Hill, Economic Conversion representatives, start working on funding for FY87, to ensure ability to fund closure of the tank systems and Cell remediation, and ensure communication of potential delays to the NCPP steering committee.

Please contact me at extension 6150 if you have any questions.

REQUIRED DISTRIBUTION**FOR ENVIRONMENTAL CONTACTS:**

Fax	Name	Company	Building
2865	T. R. Benton	WSI	T119B
3744	K. A. Holstein	DynCorp	T130D
8244	C. G. Jierree	RMRS	T130C
5001	K. North	K-H	T130F
7553	W.M. Wierzbicki	SSOC	T130A
3710	R. April	DOE, RFFO	118

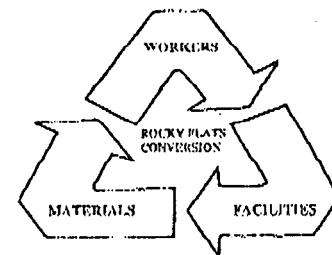
ADDITIONAL DISTRIBUTION (Below are additional recipients of this contact record)

FAX:	Name:	Company:	Bldg.:
4018	R. H. Essig	SSOC	881
7326	T. M. Karas	SSOC	886A
2982	M. D. Klein	SSOC	779
5001	K. M. Lavorato	KH	130C
7326	L. A. Pasquini	SSOC	886
4018	H. B. Padron	SSOC	881
7326	S. C. Raish	SSOC	886
5713	M. S. Simmons	MSC	883
4845	P. W. Swenson	SSOC	117
5001	K. W. Ticknor	RMRS	130C
5001	J. K. Wrapp	KH	130C

NATIONAL CONVERSION PILOT PROJECT

Rocky Flats Environmental Technology Site
P.O. Box 4085, Building 883
Golden, Colorado 80402-4085
303-966-9680

November 3, 1997



Mr. Ed Smith
Colorado Department of Public Health and Environment
4300 Cherry Creek South Drive, HW&WMD
Denver, CO 80220-1530

01L97072

Dear Mr. Smith:

This letter is in response to your inspection of Building 865 at the Rocky Flats Environmental Technology Site on October 15, 1997. During the inspection you noted three items which are the responsibility of Manufacturing Sciences Corporation, contractor for the National Conversion Pilot Project. This correspondence serves to identify the response to these three items.

1. "The Led Plate #250 in room 145 should be managed as HW rather than excess chemicals. Any used oils in that same room should not be managed as 'waste chemicals'."

Response: MSC maintains that because the small container of Led Plate #250 was in the original container, and can be accepted as part of the excess chemical program it is acceptable to manage as such. However, as the container was damaged and was missing the cap it has been added to a satellite accumulation area approved for lead. This determination and action was completed on October 16, 1997. The containers of oil located in room 145 are primarily product. Any oil that is waste has been labeled "Used Oil" and is being managed accordingly.

2. "The two drums of Ox-Out should be labeled as HW, dated with an accumulation start date and managed a the 90-day accumulation area."

Response: The determination that the Ox-Out was waste was made the previous day of the inspection. The Ox-Out was awaiting transfer into suitable containers that could be sealed prior to movement into the 90-day area. This transfer happened, as planned, during the afternoon of the inspection, and was complete by close of business on October 15, 1997.

3. "Review of TSR reports are pending." Response: TSR reports were furnished, reviewed by you and found acceptable on October 15, 1997. No further action is required.

Mr. Ed Smith
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November 3, 1997

Please feel free to contact me with any questions or comments that you may have regarding this subject.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Simmons", with a large, stylized loop at the end.

Michael Simmons
Operations Manager

cc:

Dennis R. Floyd
Gary R Konwinski - RMRS
John Wrapp - K-H

**Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division**

4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222
(303) 692-3300

Notice of Inspection

Facility Name Rocky Flats Environmental Technology Site			EPA I.D. # C07890010526	Date 10/15/97
Street P.O. Box 928			Telephone # (303) 966-7000	Seq. #
City Golden	County Jefferson	Zip 80402	Inspection Arranged Prior to Inspection (X) Yes () No	Hour In: 8:00 am
Facility Representatives and Titles Gary Kowalski, RMR's Eng. Mgr. Michael Simmons, MGR			Enter By: (X) Consent () Warrant	Hour Out: 11:00 am
			Agency: (X) State () Oversight () Joint	
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or <input type="checkbox"/> Other _____ If Status Changed, Facility Should Revise Notification				

COMMENTS:

1. The led Plate No. 250 in Room 145 should be managed as a HW rather than excess chemicals. Any used oils in that same room should not be managed as "waste chemicals".
2. Mark containers of used oil per 6CCR 1007-2, section 279.32 if they will be recycled, or provide justification for why they cannot be recycled, the disposition and HW determination.
3. The 2 drums of Ox-Out should be labeled as HW, dated with an accumulation start date and managed at the 90-day accumulation area.
4. Provide an inventory and HW determination with supporting justification for items in the Permit area.
5. Provide a HW determination for 3 drums on the south of Bldg
6. Provide an inventory for cargo containers on the south side of Bldg (K-H)

Compliance Assistance: ☐ Compliance Information ☐ Referral to Compliance Assistance ☐ Pollution Prevention ☐ Field Assistance

Samples, Documents, Plans, and / or Photos Collected	4. Review of TSR reports are pending
1. Provide a written response to	5.
2. the above by October 30, 1997	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Gary R. Kowalski 10-15-97
Michael Simmons 10-15-97

Signature of Facility Representative

Lead-Inspector: _____

Assisting Inspector(s) and Multimedia Participant(s):

